

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
CHARLOTTE C. CHARLES	:	
Debtor	:	CASE NO. 1-17-01597-HWV
	:	
	:	
AMERICAN CREDIT ACCEPTANCE	:	Motion for Relief From Stay
Movant	:	
v.	:	
	:	
CHARLOTTE C. CHARLES	:	
IAN WAYNE CHARLES	:	
CHARLES J. DEHART III, CH. 13	:	
TRUSTEE,	:	
Respondents	:	

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY AMERICAN CREDIT ACCEPTANCE**

Comes Now, Debtor, Charlotte C. Charles, by and through her counsel, Lisa A. Rynard, Esquire, and Answers the Motion for Relief from the Automatic Stay filed by American Credit Acceptance, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part, denied in part.
 - A. Admitted.
 - B. Admitted.
 - C. Denied. Respondent is not aware of the current value of the vehicle, however at the time of the Chapter 13 filing, the Respondent valued the vehicle in its then current condition and mileage as \$9,898.00. Strict proof otherwise is demanded at hearing.

D. Admitted in part, denied in part. It is admitted that Respondent is due for the March 16, 2019 post-petition payment. Respondent is not aware of the current payoff and as such denies that it is \$15,259.25. Strict proof is demanded at hearing.

5. Denied. While Respondent has admitted default, she wishes to cure and arrears and retain the vehicle. Movant is without cause and strict proof is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;
- c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and
- d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Purcell, Krug & Haller

By: /s/ Lisa A. Rynard

Lisa A. Rynard, Esquire
1719 N. Front Street
Harrisburg, Pa 17102
(717) 234-4178
lrynard@pkh.com

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